Affidavit of Sarah Finley Johanson

To whom it may concern. As an employee of the State Of Indiana, I am a Senior Geologist with the Indiana Department of Environmental Management, Office of Land Quality, Science Services Branch. I am the IDEM geologist assigned to review the Genuine Parts and Michigan Plaza site data.

To the best of my knowledge, there is no liner, either engineered or natural, for the source areas at Michigan Plaza and Genuine Parts. Also, none of the following are present at Michigan Plaza and Genuine Parts: (1) maintained engineered cover, or (2) functioning and maintained runon control system and runoff management system, or (3) functioning leachate collection and removal system immediately above liner.

For Michigan Plaza, I have witnessed no engineered cover, runoff or runon water management system, or leachate collection system.

Since my involvement in 2006, I have witnessed none of these items for Genuine Parts nor found any documentation of such items in the site file.

Sarah Finley Johanson

Date